III. Remarks

Reconsideration of this application is respectfully requested in light of the above amendments and the following remarks. Claims 1-14 are pending in the application. Claims 1 and 8 have been amended, and claims 2-7 and 9-14 have been maintained in their previous form.

A. Discussion of Amended Independent Claims

Claims 1 and 8 were rejected under 35 USC 102 as allegedly being anticipated by U.S. Patent No. 5,355,474 to Thuraisngham et al. These rejections are moot, as claims 1 and 8 have been amended.

Claims 1 and 8 were amended to further define the claims as covering distinct security measures at the dimension and fact levels of a database. Thuraisngham, however, neither teaches nor suggests distinct security measures at each of the dimension and fact levels. The Examiner asserts that Thuraisngham's security levels (assigned to the database entries) establish the claimed dimensional hierarchy while the database entries themselves establish the claimed dimensions. Applicants respectfully disagree with this characterization and seek to further distinguish Thuraisngham by affirmatively claiming two distinct security measures – one at the dimension level and one at the fact level. This distinction can now be affirmatively realized by contrasting the single security measure of Thuraisngham with the dual security measures of the amended independent claims. In other words, Thuraisngham's database structure necessitates a security mechanism tailored to that particular structure, i.e. assigning security levels to all objects of the database to yield a single security measure. Amended claims 1 and 8, however, are directed to security measures tailored to the particular structure of a dimensional database, i.e. assigning security measures to both dimension and fact levels.

In rejecting claims 1 and 8, the Examiner points to col. 4, lines 29-52 of Thuraisngham, which describes establishing security levels in connection with performing update requests. In establishing these security levels, Thuraisngham discloses the retrieval of security constraints, which are analyzed in determining the level of security to apply to the relation being updated. Thuraisngham goes on to state that "[w]hen constraints are processed during the update operation, the update processor will compute the security levels of the data being updated and

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ensure that the data is stored at the appropriate level." Thuraisngham, col. 4, lines 45-48. Thus,

security levels are assigned to collections of data, such as update request data, without regard to

both levels of dimensional hierarchies and facts.

Accordingly, Applicants respectfully submit that amended claims 1 and 8 are patentably

distinct from the teachings of Thuraisngham. As claims 2-7 and 9-14 depend from and further

limit independent claims 1 and 8, respectively, these claims are now in condition for allowance

as well.

B. **Conclusion**

A check is enclosed to accommodate the fees for the Request for Continued Examination

and a one-month extension of time. If any additional fees are required to complete this filing, the

Commissioner is authorized to charge those fees, or credit any overpayment, to Account No. 13-

0480, Attorney Docket No. 68146988.714.

If the Examiner has any questions regarding this Amendment and Response to Non-Final

Office Action or the Application in general, Examiner is invited to contact the Applicants'

attorney at the below-listed telephone number.

Respectfully submitted,

Date: August 22, 2005

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